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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*In re:*

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**THIRTY-SEVENTH MONTHLY FEE STATEMENT OF GILBERT LLP,  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC  
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION  
CLAIMANTS FOR THE PERIOD OCTOBER 1, 2022 THROUGH OCTOBER 31, 2022**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant:</b>	<b>Gilbert LLP</b>
<b>Authorized to provide professional services to:</b>	<b>Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants</b>
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	<b>December 2, 2019 (Docket #553)</b>
<b>Period for which compensation and reimbursement is sought:</b>	<b>October 1, 2022 through October 31, 2022</b>
<b>Amount of compensation sought as actual, reasonable, and necessary:</b>	<b>\$334,318.80 (80% of \$417,898.50)</b>
<b>Amount of expense reimbursement sought as actual, reasonable and necessary:</b>	<b>\$14,257.05 (100%)</b>
<b>This is a:</b>	<b>Monthly Fee Statement</b>

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this thirty-seventh monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing October 1, 2022 through October 31, 2022 (the “**Application Period**”).

#### **Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$417,898.50 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$334,318.80.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$715.58. The blended hourly rate of paraprofessionals during the Application Period is \$294.41.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$8,464.55 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$8,464.55.

4. Annexed hereto as **Exhibit D** is the summary of reasonable and necessary expenses incurred by Gilbert LLP for retained consulting experts, which have not yet been paid. Pursuant to the retention agreements applicable to these consulting experts, Gilbert LLP is not obligated to actually pay the incurred amounts until those expenses have been approved pursuant to the process mandated by the Procedures Order. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks payment for 100% of such expenses, totaling \$5,792.50. Upon receipt, Gilbert LLP will promptly pay the accrued expenses that are approved.

5. Annexed hereto as **Exhibit E** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

**FILING AND SERVICE**

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

7. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

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WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$334,318.80 (80% of \$417,898.50) and reimbursement of reasonable and necessary expenses incurred in the amount of \$14,257.05 (100%), for a total amount of \$348,575.85 for the Application Period.

Dated: December 16, 2022  
Washington, DC

Respectfully submitted,

**GILBERT LLP**

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of  
Governmental and Other Contingent  
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**Exhibit A**

**Summary of Services by Category**

**SUMMARY OF SERVICES BY PROJECT CATEGORY**

<b>Project Code</b>	<b>Project Category</b>	<b>Hours Billed in Period</b>	<b>Fees for Period</b>
A004	Case Administration	6.0	\$1,200.00
A009	Meetings / Communications with AHC & Creditors	1.6	\$2,670.00
A015	Non-Working Travel (Billed @ 50%)	24.0	\$15,000.00
A020	Insurance Adversary Proceeding	606.9	\$399,028.50
		<b>638.5</b>	<b>\$417,898.50</b>

**Exhibit B**

**Summary of Compensation by Professional**



Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate <sup>2</sup>	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia – 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade – 1984 U.S. Supreme Court – 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation – 2017 U.S. Court of Federal Claims – 2019	\$1,800	1.0	\$1,800.00
Richard Leveridge	Partner / State of New York – 1997 District of Columbia – 1981 U.S. Court of Appeals for the District of Columbia – 1981 U.S. District Court for the District of Columbia – 1982 U.S. Supreme Court - 1986 U.S. Court of Appeals for the Fourth Circuit - 1988 U.S. District Court for the Eastern District of New York – 1988 U.S. District Court for the Southern District of New York - 1998 U.S. District Court for the District of Maryland – 2000 U.S. Court of Appeals for the Second Circuit - 2020	\$1,450 \$725	33.3 8.0	\$48,285.00 \$5,800.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,450 \$725	33.0 8.0	\$47,850.00 \$5,800.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$850 \$425	78.9 8.0	\$67,065.00 \$3,400.00
Jon Dougherty	Of Counsel / State of New York – 2014 U.S. District Court for the Southern District of New York – 2014 District of Columbia – 2016 U.S. District Court for District of Wisconsin – 2017 U.S. Bankruptcy Court for the Southern District of New York - 2022	\$720	20.0	\$14,400.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia – 2017	\$700	87.2	\$61,040.00
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$660	6.6	\$4,356.00
Alison Gaske	Associate / District of Columbia – 2016	\$610	76.8	\$46,848.00

<sup>2</sup> Non-working travel is billed @ 50% of regular hourly rate.

<b>Name of Professional</b>	<b>Position / Year Admitted Practice</b>	<b>Hourly Billing Rate<sup>2</sup></b>	<b>Hours Billed for Period</b>	<b>Total Fees for Period</b>
Ethan Kaminsky	Associate / State of New York – 2018 U.S. Court of Appeals for the Second Circuit – 2018 U.S. District Court for the Southern District of New York - 2019 Second Circuit Court of Appeals – 2020	\$560	15.1	\$8,456.00
Janet Sanchez	Associate / Commonwealth of Virginia – 2020 District of Columbia - 2022	\$475	10.3	\$4,892.50
Ifenanya Agwu	Associate / District of Columbia – 2022	\$475 <sup>3</sup>	86.9	\$41,277.50
December Huddleston	Associate / District of Columbia – 2021	\$475 <sup>3</sup>	25.4	\$12,065.00
John Girgenti	Staff Attorney / State of New York – 2002 District of Columbia – 2007	\$365	47.4	\$17,301.00
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$425	19.4	\$8,245.00
Alyssa Bonesteel	eDiscovery & Policy Review Coordinator– Joined firm in 2018	\$375	3.8	\$1,425.00
Sherley Martinez	Paralegal – Joined firm in 2017	\$325	3.7	\$1,202.50
Nick Poz	Paralegal – Joined firm in 2022	\$325	26.0	\$8,450.00
Carmen Turner	Junior Paralegal – Joined firm in 2021	\$200	39.7	\$7,940.00
	<b>Totals</b>		<b>638.5</b>	<b>\$417,898.50</b>
	<b>Attorney Blended Rate</b>	<b>\$715.58</b>		
	<b>Paraprofessional Blended Rate</b>	<b>\$294.41</b>		

<sup>3</sup> The rate change is due to promotion effective as of October 1, 2022.

**Exhibit C**

**Summary of Expenses Incurred**

**SUMMARY OF EXPENSES INCURRED**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Contracted Professional Fees – Litigation Vendors	\$1,302.35
Depositions / Transcripts	\$4,187.15
Travel – Lodging	\$1,500.00
Travel – Meals	\$91.05
Travel – Parking	\$125.00
Travel – Train Fare	\$1,259.00
<b>Total</b>	<b>\$8,464.55</b>

**Exhibit D**

**Summary of Expenses Incurred and Not Yet Paid**

**SUMMARY OF EXPENSES INCURRED BUT NOT YET PAID**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Insurance Consulting Expert A	\$5,792.50
<b>Total</b>	<b>\$5,792.50</b>

**Exhibit E**

**Time and Expense Detail**

**GILBERT** LLP

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Ad Hoc Committee  
c/o Marshall S. Huebner  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

November 29, 2022  
Invoice Number: 11328472  
Client Number: 1599  
Tax ID: 52-2283869

**FOR PROFESSIONAL SERVICES RENDERED through October 31, 2022**

**Re: Ad Hoc Committee (Purdue)**

<b>Matter Description</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
Purdue Bankruptcy	417,898.50	8,464.55	426,363.05
<b>Total</b>	<b>417,898.50</b>	<b>8,464.55</b>	<b>426,363.05</b>

TOTAL FEES \$ 417,898.50

TOTAL EXPENSES \$ 8,464.55

**TOTAL FEES AND EXPENSES \$ 426,363.05**



**FOR PROFESSIONAL SERVICES RENDERED through October 31, 2022**

**Purdue Bankruptcy**

**A004: Case Administration**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Turner, C.	10/03/22	Review court docket for insurance-related pleadings recently filed.	.90	180.00
Turner, C.	10/11/22	Review court docket for recently filed insurance-related pleadings.	.70	140.00
Turner, C.	10/17/22	Review court docket for insurance-related pleadings recently filed in case.	2.00	400.00
Turner, C.	10/24/22	Review court docket for recently filed insurance-related pleadings.	2.40	480.00
<b>Project Total:</b>			<b>6.00</b>	<b>\$ 1,200.00</b>

**A009: Meetings / Communications with AHC & Creditors**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	10/11/22	Confer with AHC members re strategy.	.50	900.00
Gilbert, S.	10/13/22	Confer with AHC members re strategy.	.50	900.00
Leveridge, R.	10/20/22	Confer with AHC re discovery issue.	.60	870.00
<b>Project Total:</b>			<b>1.60</b>	<b>\$ 2,670.00</b>

**A015: Non-Working Travel (Billed @ 50%)**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Shore, R.	10/24/22	Travel from Washington, DC to New York, NY for strategy meeting with co-counsel.	4.00	2,900.00
Rubinstein, J.	10/24/22	Travel from Washington, DC to New York, NY for meeting with co-counsel re strategy.	4.00	1,700.00
Leveridge, R.	10/24/22	Travel from Washington, DC to New York, NY for meeting with co-counsel.	4.00	2,900.00
Rubinstein, J.	10/25/22	Travel from New York, NY to Washington, DC.	4.00	1,700.00
Shore, R.	10/26/22	Travel from New York, NY to Washington, DC.	4.00	2,900.00
Leveridge, R.	10/26/22	Travel from New York, NY to Washington, DC.	4.00	2,900.00
<b>Project Total:</b>			<b>24.00</b>	<b>\$ 15,000.00</b>

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**A020: Insurance Adversary Proceeding**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Rubinstein, J.	10/01/22	Begin reviewing response to Insurer #25 discovery (0.3); begin analysis re Deponent #13 deposition (0.2); revise draft pleading re Insurer #36 (0.2).	.70	595.00
Shore, R.	10/02/22	Analyze Issue #27.	1.00	1,450.00
Rubinstein, J.	10/02/22	Communicate with Insurers #18, #19, and #20 counsel and A. Gaske re draft policy stipulation.	.20	170.00
Rush, M.	10/02/22	Review insurers' objections to Rule 30(b)(6) topics.	.60	420.00
Rush, M.	10/02/22	Draft response to insurers' objections to Rule 30(b)(6) topics.	1.40	980.00
Gaske, A.	10/02/22	Analyze draft discovery response to Insurer #25 request for production.	.90	549.00
Gaske, A.	10/02/22	Review Insurers #18, #19, and #20 comments to proposed policy pages re policy stipulation.	.40	244.00
Shore, R.	10/03/22	Confer with J. Rubinstein, M. Rush, A. Gaske, and J. Dougherty re objections to Rule 30(b)(6) notices.	.70	1,015.00
Rubinstein, J.	10/03/22	Analysis re insurer objections to Rule 30(b)(6) notices and preparation for meet-and-confer discussion (2.6); confer with team re same (0.7); communicate with P. Breene re policy language analysis (0.2); communicate with A. Gaske re Insurers #18, #19, and #20 policy stipulation discussion (0.1); revise draft responses to Insurer #25 discovery (0.7); correspond with co-counsel re defensive discovery scheduling (0.3); revise discovery correspondence re privilege logs (0.7); analysis of materials relevant to Deponent #13 deposition (1.2).	6.50	5,525.00
Rush, M.	10/03/22	Continue drafting response to insurers' objections to Rule 30(b)(6) topics.	8.10	5,670.00
Rush, M.	10/03/22	Confer with R. Shore, J. Rubinstein, J. Dougherty, and A. Gaske re insurer Rule 30(b)(6) notices.	.70	490.00
Rush, M.	10/03/22	Review draft letter to insurers re privilege logs.	.20	140.00
Martinez, S.	10/03/22	Revise discovery tracker.	.30	97.50
Gaske, A.	10/03/22	Confer with R. Shore, J. Rubinstein, M. Rush, and J. Dougherty re objections to Rule 30(b)(6) notices.	.70	427.00
Gaske, A.	10/03/22	Continue analyzing draft discovery response to Insurer #25 request for production.	1.20	732.00
Gaske, A.	10/03/22	Review Insurers #18, #19, and #20 comments to policy page spreadsheet.	.70	427.00
Gaske, A.	10/03/22	Analyze summary of Rule 30(b)(6) objections.	.50	305.00
Gaske, A.	10/03/22	Review whether policies contain certain provision related to Issue #27.	1.70	1,037.00

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Name	Date	Services	Hours	Amount
Kaminsky, E.	10/03/22	Review objections to Rule 30(b)(6) notice re response.	1.00	560.00
Turner, C.	10/03/22	Review and organize Rule 30(b)(1) and Rule 30(b)(6) deposition materials.	.20	40.00
Turner, C.	10/03/22	Continue to review and revise Publicis Health's article summaries.	2.70	540.00
Hubbard, B.	10/03/22	Continue review of IQVIA document production.	3.50	1,487.50
Agwu, I.	10/03/22	Continue reviewing Deponent #12 deposition transcript.	4.00	1,900.00
Poz, N.	10/03/22	Update case calendar to reflect objections served by insurers in response to notices of Rule 30(b)(6) depositions and other recent filings.	.20	65.00
Poz, N.	10/03/22	Prepare tracking spreadsheet re formal discovery submissions.	1.50	487.50
Poz, N.	10/03/22	Review and organize recent communications re discovery dispute with insurers.	.30	97.50
Dougherty, J.	10/03/22	Confer with team re Rule 30(b)(6) notices.	.70	504.00
Dougherty, J.	10/03/22	Review objections to Rule 30(b)(6) deposition notices from insurers for drafting working document for responding to such objections.	1.50	1,080.00
Dougherty, J.	10/03/22	Review draft letter re forthcoming meet-and-confer re insurers' Rule 30(b)(6) objections.	.80	576.00
Shore, R.	10/04/22	Confer with J. Rubinstein and A. Gaske re Insurers #18, #19, and #20 comments to proposed policy pages for policy stipulation.	.50	725.00
Rubinstein, J.	10/04/22	Revise discovery correspondence and responses (0.8); correspond with insurer counsel re policy stipulation discussions (0.8); confer with R. Shore and A. Gaske re Insurers #18, #19, and #20 policy stipulation (0.5).	2.10	1,785.00
Sanchez, J.	10/04/22	Draft summary of insurer deponent deposition.	3.80	1,805.00
Rush, M.	10/04/22	Review documents in preparation of insurer depositions.	1.20	840.00
Martinez, S.	10/04/22	Communicate with N. Poz re discovery tracking and databases.	.20	65.00
Gaske, A.	10/04/22	Confer with R. Shore and J. Rubinstein re Insurers #18, #19, and #20 comments to proposed policy pages for policy stipulation.	.50	305.00
Gaske, A.	10/04/22	Revise draft pleading re Insurer #36 pursuant to J. Rubinstein comments.	.40	244.00
Gaske, A.	10/04/22	Confer with J. Dougherty re response to Rule 30(b)(6) objections.	.70	427.00

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Name	Date	Services	Hours	Amount
Gaske, A.	10/04/22	Continue review of Insurers #18, #19, and #20 comments to policy page spreadsheet re policy stipulation.	.60	366.00
Gaske, A.	10/04/22	Correspond with insurers re scheduling policy stipulation call.	.20	122.00
Gaske, A.	10/04/22	Review deposition tracking spreadsheet.	.30	183.00
Gaske, A.	10/04/22	Begin drafting response to insurers' Rule 30(b)(6) objections.	1.70	1,037.00
Turner, C.	10/04/22	Review and organize Deponent #8, Deponent #10, and Deponent #12 deposition transcripts.	.30	60.00
Hubbard, B.	10/04/22	Continue review of IQVIA document production.	5.60	2,380.00
Agwu, I.	10/04/22	Continue drafting summary of Deponent #12 deposition.	4.00	1,900.00
Poz, N.	10/04/22	Continue updating tracking of formal discovery submissions.	5.30	1,722.50
Dougherty, J.	10/04/22	Confer with A. Gaske re letter related to upcoming meet-and-confer concerning Rule 30(b)(6) deposition notice objections.	.70	504.00
Sanchez, J.	10/05/22	Review document summaries of third-party document production.	2.70	1,282.50
Rush, M.	10/05/22	Review documents in preparation for insurer depositions.	.60	420.00
Martinez, S.	10/05/22	Review and revise discovery tracking log.	.10	32.50
Gaske, A.	10/05/22	Draft response to Rule 30(b)(6) objections.	3.60	2,196.00
Gaske, A.	10/05/22	Research response to Rule 30(b)(6) objections.	.40	244.00
Turner, C.	10/05/22	Review and organize third-party subpoenas.	.30	60.00
Hubbard, B.	10/05/22	Document summary of IQVIA document review.	2.30	977.50
Hubbard, B.	10/05/22	Review final subset of IQVIA produced documents.	4.30	1,827.50
Agwu, I.	10/05/22	Continue drafting summary of Deponent #12 deposition.	4.50	2,137.50
Poz, N.	10/05/22	Continue updating tracking re formal discovery submissions (except depositions and production of documents).	.90	292.50
Shore, R.	10/06/22	Confer with team re case status and strategy.	.60	870.00
Girgenti, J.	10/06/22	Confer with team re case update.	.60	219.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	10/06/22	Review co-counsel communications re discovery (0.5); confer with Insurer #33 counsel and A. Gaske re proposed policy stipulation (0.5); update litigation task agenda (0.7); confer with team re case status and next steps (0.6); correspond with A. Gaske re policy term analysis (0.1); review summaries of third-party productions (0.3); communicate with M. Rush re Insurer #25 produced documents (0.2); review revisions to discovery correspondence circulated by co-counsel (0.3); confer with Insurers #18, #19, and #20 counsel re policy stipulation (0.3); confer with A. Gaske re same (0.4).	3.90	3,315.00
Sanchez, J.	10/06/22	Confer with team re case status and next tasks.	.60	285.00
Rush, M.	10/06/22	Continue reviewing documents in preparation for insurer depositions.	1.50	1,050.00
Rush, M.	10/06/22	Confer with team re case status and strategy.	.60	420.00
Rush, M.	10/06/22	Analyze insurers' Rule 30(b)(6) objections.	1.20	840.00
Martinez, S.	10/06/22	Confer with team re case status and strategy.	.60	195.00
Martinez, S.	10/06/22	Review databases re discovery responses and requests.	.80	260.00
Bonesteel, A.	10/06/22	Confer with team re case updates and upcoming projects.	.60	225.00
Gaske, A.	10/06/22	Confer with team re litigation strategy and status.	.60	366.00
Gaske, A.	10/06/22	Confer with counsel for Insurers #18, #19, and #20 and J. Rubinstein re policy stipulation.	.30	183.00
Gaske, A.	10/06/22	Confer with J. Rubinstein re case strategy.	.40	244.00
Gaske, A.	10/06/22	Review policy issue.	.10	61.00
Gaske, A.	10/06/22	Confer with counsel for Insurer #33 re policy stipulation.	.50	305.00
Gaske, A.	10/06/22	Communicate with J. Rubinstein re policy stipulations.	.20	122.00
Gaske, A.	10/06/22	Correspond with counsel for Insurer #25 re policy stipulation.	.20	122.00
Gaske, A.	10/06/22	Review Insurers #18, #19, and #20 policy comparison spreadsheet.	.40	244.00
Gaske, A.	10/06/22	Confer with C. Turner re comparison spreadsheet re Insurers #18, #19, and #20.	.20	122.00
Gaske, A.	10/06/22	Review insurer responses to Rule 30(b)(6) notices.	1.70	1,037.00
Kaminsky, E.	10/06/22	Confer with team re case status and strategy.	.60	336.00
Kaminsky, E.	10/06/22	Research case law re discovery responses and objections to Rule 30(b)(6) topics.	2.80	1,568.00
Turner, C.	10/06/22	Review and organize third-party subpoenas.	.30	60.00

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Turner, C.	10/06/22	Confer with A. Gaske re Insurers #18, #19, and #20 policy comparison.	.20	40.00
Turner, C.	10/06/22	Confer with team re strategy and case updates.	.60	120.00
Turner, C.	10/06/22	Review and organize Insurers #18, #19, and #20 policies.	3.90	780.00
Hubbard, B.	10/06/22	Confer with team re status and strategy.	.60	255.00
Huddleston, D.	10/06/22	Confer with team re case update.	.60	285.00
Agwu, I.	10/06/22	Continue drafting summary of Deponent #12 deposition.	4.00	1,900.00
Agwu, I.	10/06/22	Confer with team re case status and strategy.	.60	285.00
Poz, N.	10/06/22	Update case calendar re objections served by insurers in response to notices of Rule 30(b)(6) depositions.	.20	65.00
Dougherty, J.	10/06/22	Confer with team re status and next steps.	.60	432.00
Dougherty, J.	10/06/22	Communicate with A. Gaske re draft of letter re Rule 30(b)(6) deposition notice objections.	.50	360.00
Rubinstein, J.	10/07/22	Review revised outline re Rule 30(b)(6) meet-and-confer discussion and provide comments (1.8); correspond with co-counsel re strategy (0.4); review proposed edits to Insurers #18, #19, and #20 policy stipulation (0.3); revise A. Gaske correspondence to co-counsel re policy stipulations (0.3).	2.80	2,380.00
Rush, M.	10/07/22	Analyze insurers' Rule 30(b)(6) objections.	1.20	840.00
Gaske, A.	10/07/22	Draft Rule 30(b)(6) deficiency letter.	2.80	1,708.00
Gaske, A.	10/07/22	Review revisions to Insurers #18, #19, and #20 policy comparison spreadsheet re final proposal of pages.	2.80	1,708.00
Gaske, A.	10/07/22	Correspond with co-counsel re policy stipulations.	.40	244.00
Kaminsky, E.	10/07/22	Continue researching case law re discovery responses and objections to Rule 30(b)(6) topics.	3.10	1,736.00
Turner, C.	10/07/22	Review communication with Veritext re Deponent #1 and Deponent #2 depositions.	.40	80.00
Agwu, I.	10/07/22	Continue drafting summary of Deponent #12 deposition.	3.00	1,425.00
Poz, N.	10/07/22	Update tracking re formal discovery submissions.	.20	65.00
Poz, N.	10/07/22	Review policies of Insurers #18, #19, and #20.	.20	65.00
Rubinstein, J.	10/09/22	Correspond with co-counsel re policy stipulations.	.20	170.00
Gaske, A.	10/09/22	Draft Rule 30(b)(6) deficiency letter.	2.30	1,403.00
Gaske, A.	10/09/22	Research scope of discovery.	.70	427.00
Gaske, A.	10/10/22	Draft letter in response to insurer Rule 30(b)(6) objections.	2.70	1,647.00

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Name	Date	Services	Hours	Amount
Shore, R.	10/11/22	Analyze pending discovery issues.	.50	725.00
Rubinstein, J.	10/11/22	Correspond with co-counsel re policy stipulations (0.2); correspond with co-counsel and insurer counsel re scheduling various depositions (0.5); review proposed revisions to responses to Insurer #25 supplement discovery requests (0.2); communicate with team re Deponent #13 deposition (0.1); communicate with team re Insurer #36 (0.1).	1.10	935.00
Rush, M.	10/11/22	Review documents in preparation for insurer depositions.	6.10	4,270.00
Rush, M.	10/11/22	Analyze insurer objections in preparation for meet-and-confer with insurers.	.40	280.00
Gaske, A.	10/11/22	Correspond with paralegal team re deposition scheduling.	.60	366.00
Gaske, A.	10/11/22	Review Insurers #9 and #23 revisions to draft policy stipulation.	.20	122.00
Gaske, A.	10/11/22	Revise draft letter to insurers re Rule 30(b)(6) responses.	1.60	976.00
Gaske, A.	10/11/22	Review Insurer #25 edits to draft policy stipulation.	.40	244.00
Turner, C.	10/11/22	Review and organize insurer counsel list.	1.50	300.00
Huddleston, D.	10/11/22	Draft summary of Deponent #10 deposition.	2.00	950.00
Poz, N.	10/11/22	Update databases to include recent discovery communications from opposing counsel and production.	.90	292.50
Dougherty, J.	10/11/22	Revise draft letter re meet-and-confer of Rule 30(b)(6) deposition notices.	1.90	1,368.00
Dougherty, J.	10/11/22	Review insurer objections to Rule 30(b)(6) deposition notices in preparation for meet-and-confer.	1.00	720.00
Shore, R.	10/12/22	Review and revise Issue #34 memorandum.	4.00	5,800.00
Shore, R.	10/12/22	Confer with J. Rubinstein re Rule 30(b)(6) call with insurers, Issue #34, and litigation strategy.	.40	580.00
Shore, R.	10/12/22	Confer with insurers re Rule 30(b)(6) issues.	.50	725.00
Girgenti, J.	10/12/22	Review and identify key provisions from at-issue policies.	3.00	1,095.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	10/12/22	Analysis re Insurer #36 (0.2); correspond with co-counsel re Deponent #15 deposition (0.2); confer with Insurer #25 counsel re policy stipulation (0.2); confer with M. Rush, A. Gaske, and J. Dougherty re meet-and-confer preparation (1.6); review issues re same (0.2); review discovery correspondence from Insurer #24 (0.3); analysis re discovery responses to Insurer #25 (0.2); participate in meet-and-confer with insurer counsel re Rule 30(b)(6) deposition topics (1.6); confer with R. Shore re strategy (0.4).	4.90	4,165.00
Rush, M.	10/12/22	Review documents in preparation of Insurer #25 depositions.	2.70	1,890.00
Rush, M.	10/12/22	Confer with J. Rubinstein, A. Gaske, and J. Dougherty re strategy for meet-and-confer.	1.60	1,120.00
Rush, M.	10/12/22	Meet-and-confer with insurers re Rule 30(b)(6) topics.	1.60	1,120.00
Bonesteel, A.	10/12/22	Review policies in database in preparation for policy review.	.80	300.00
Gaske, A.	10/12/22	Confer with J. Rubinstein, M. Rush and J. Dougherty re preparation for Rule 30(b)(6) meet and confer.	1.60	976.00
Gaske, A.	10/12/22	Confer with opposing counsel re Rule 30(b)(6) notice objections.	1.60	976.00
Gaske, A.	10/12/22	Confer with counsel for Insurer #25, co-plaintiffs counsel and J. Rubinstein re policy stipulation.	.20	122.00
Gaske, A.	10/12/22	Revise Insurer #25 policy stipulation.	.40	244.00
Gaske, A.	10/12/22	Correspond with policy review team re next steps.	.40	244.00
Turner, C.	10/12/22	Review Deponent #12 errata sheet.	.30	60.00
Poz, N.	10/12/22	Participate in meet-and-confer call with opposing counsel re Rule 30(b)(6) deposition notices.	1.60	520.00
Dougherty, J.	10/12/22	Review and incorporate additional comments into draft letter re meet-and-confer.	.80	576.00
Dougherty, J.	10/12/22	Confer with J. Rubinstein, M. Rush and A. Gaske re preparation for meet-and-confer with insurer counsel related to Rule 30(b)(6) deposition notices.	1.60	1,152.00
Dougherty, J.	10/12/22	Participate in meet-and-confer with counsel for insurers' re Rule 30(b)(6) deposition notices.	1.60	1,152.00
Dougherty, J.	10/12/22	Review letter from insurer counsel re written discovery requests and Rule 30(b)(6) deposition notices.	.40	288.00
Shore, R.	10/13/22	Confer with J. Rubinstein re strategy.	1.10	1,595.00
Shore, R.	10/13/22	Confer with team re case status.	.40	580.00
Shore, R.	10/13/22	Review and comment on discovery responses.	.80	1,160.00



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Name	Date	Services	Hours	Amount
Girgenti, J.	10/13/22	Confer with team re case update.	.40	146.00
Girgenti, J.	10/13/22	Analyze key provisions from at-issue policies.	7.10	2,591.50
Rubinstein, J.	10/13/22	Correspond with co-counsel re deposition scheduling (0.5); confer with R. Shore re strategy (1.1); revise litigation task list (0.6); communicate with R. Shore re draft discovery responses (0.1); review proposed revisions to same (0.2); confer with team re strategy (0.4); confer with A. Gaske re revisions to policy stipulations (0.5); analysis re Deponent #7 deposition (0.2).	3.60	3,060.00
Rush, M.	10/13/22	Continue to review documents in preparation for insurer depositions.	1.60	1,120.00
Rush, M.	10/13/22	Review documents in preparation for Deponent #6 deposition.	.40	280.00
Martinez, S.	10/13/22	Confer with team re case status and strategy.	.40	130.00
Bonesteel, A.	10/13/22	Confer with Cobra team re transcript review platform.	.40	150.00
Gaske, A.	10/13/22	Confer with team re litigation strategy and next steps.	.40	244.00
Gaske, A.	10/13/22	Communicate with J. Rubinstein re historic settlement agreement.	.20	122.00
Gaske, A.	10/13/22	Confer with J. Rubinstein re policy stipulations.	.50	305.00
Gaske, A.	10/13/22	Draft summary re status of all policy stipulations and review related documents.	1.50	915.00
Gaske, A.	10/13/22	Review and revise summary of meet-and-confer with insurers.	3.90	2,379.00
Gaske, A.	10/13/22	Review comments re pleading re Insurer #36.	.20	122.00
Gaske, A.	10/13/22	Correspond with L. Szymanski re policy stipulations.	.20	122.00
Turner, C.	10/13/22	Confer with team re litigation strategy and case updates.	.40	80.00
Hubbard, B.	10/13/22	Confer with team re status and strategy.	.40	170.00
Huddleston, D.	10/13/22	Confer with team re case status and strategy.	.40	190.00
Huddleston, D.	10/13/22	Review Deponent #10 deposition transcript.	1.20	570.00
Agwu, I.	10/13/22	Continue summarizing Deponent #12 deposition.	4.00	1,900.00
Poz, N.	10/13/22	Draft summary of meet-and-confer with opposing counsel on supplemental Rule 30(b)(6) deposition notices.	1.60	520.00
Poz, N.	10/13/22	Confer with team re case status and next steps.	.40	130.00
Poz, N.	10/13/22	Organize exhibits to proposed stipulation with an insurer.	.30	97.50

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Name	Date	Services	Hours	Amount
Dougherty, J.	10/13/22	Review and revise draft letter re Rule 30(b)(6) deposition notices.	1.00	720.00
Dougherty, J.	10/13/22	Confer with team re status and next steps.	.40	288.00
Shore, R.	10/14/22	Confer with J. Rubinstein re discovery issues (0.8); analyze litigation strategy and next steps (0.6); finalize Issue #34 memorandum (1.1).	2.50	3,625.00
Girgenti, J.	10/14/22	Continue reviewing key provisions from at-issue policies.	7.20	2,628.00
Rubinstein, J.	10/14/22	Confer with R. Leveridge re status of tasks and strategy (1.1); confer with Debtors' counsel re deposition scheduling (0.5); analysis re policy stipulations (0.3); confer with R. Shore re discovery responses and comments to co-counsel (0.8); communicate with co-counsel re strategy session (0.4); review materials and issues in preparation for defensive deposition (0.5); communicate with insurer counsel and co-counsel re Rule 30(b)(6) meet-and-confer scheduling (0.2); review indemnification demand against Debtors (0.3); review materials re Deponent #13 in preparation for deposition (1.3).	5.40	4,590.00
Rush, M.	10/14/22	Continue reviewing documents in preparation for insurer depositions.	2.80	1,960.00
Gaske, A.	10/14/22	Review and revise summary of meet-and-confer with insurers.	1.70	1,037.00
Leveridge, R.	10/14/22	Confer with J. Rubinstein re litigation status and strategy (1.1); communicate with co-counsel (P. Breene) re discovery matters (0.5); communicate with team re meet-and-confer re Rule 30(b)(6) deposition topics (0.3).	1.90	2,755.00
Leveridge, R.	10/14/22	Communicate with co-counsel re indemnity request to Debtors in wrongful death action (0.3); review material re same (0.6).	.90	1,305.00
Kaminsky, E.	10/14/22	Revise Insurer #36 pleading.	.80	448.00
Turner, C.	10/14/22	Revise pleading re Insurer #36.	4.00	800.00
Huddleston, D.	10/14/22	Continue drafting summary of Deponent #10 deposition.	2.00	950.00
Agwu, I.	10/14/22	Continue summarizing Deponent #12 deposition transcript.	6.50	3,087.50
Poz, N.	10/14/22	Finalize summary re meet-and-confer with insurer counsel re Rule 30(b)(6) deposition notices.	.20	65.00
Rubinstein, J.	10/16/22	Review revised Insurer #36 pleading.	.20	170.00
Huddleston, D.	10/16/22	Draft summary of Deponent #10 deposition.	3.50	1,662.50

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Name	Date	Services	Hours	Amount
Shore, R.	10/17/22	Communicate with A. Gaske and J. Dougherty re insurers' assertion of attorney-client privilege.	.20	290.00
Girgenti, J.	10/17/22	Continue reviewing key provisions from at-issue policies.	7.70	2,810.50
Rush, M.	10/17/22	Continue reviewing documents in preparation for insurer depositions.	4.20	2,940.00
Bonesteel, A.	10/17/22	Review coding in policy review platform for attorney review.	.40	150.00
Bonesteel, A.	10/17/22	Communicate with Cobra Legal Solutions re transcript review application.	.40	150.00
Gaske, A.	10/17/22	Review revised pleading re Insurer #36.	.50	305.00
Gaske, A.	10/17/22	Revise response letter to Insurers' Rule 30(b)(6) objections.	3.70	2,257.00
Leveridge, R.	10/17/22	Review materials in preparation for depositions (0.4); communications with co-counsel re same (0.4).	.80	1,160.00
Turner, C.	10/17/22	Continue to revise pleading re Insurer #36.	3.90	780.00
Huddleston, D.	10/17/22	Draft summary of Deponent #10 deposition transcript.	1.90	902.50
Agwu, I.	10/17/22	Continue summarizing Deponent #12 deposition transcript.	6.50	3,087.50
Dougherty, J.	10/17/22	Revise draft letter to insurers re Rule 30(b)(6) deposition notices.	1.20	864.00
Girgenti, J.	10/18/22	Continue analyzing key provisions from at-issue policies.	7.50	2,737.50
Rush, M.	10/18/22	Continue reviewing documents in preparation of insurer depositions.	2.30	1,610.00
Gaske, A.	10/18/22	Review procedural case law.	1.10	671.00
Leveridge, R.	10/18/22	Continue reviewing materials in preparation for upcoming depositions.	1.50	2,175.00
Turner, C.	10/18/22	Review and organize deposition materials for Deponent #7.	3.20	640.00
Huddleston, D.	10/18/22	Continue drafting summary of Deponent #10 deposition.	1.70	807.50
Agwu, I.	10/18/22	Continue summarizing Deponent #12 deposition transcript.	6.50	3,087.50
Poz, N.	10/18/22	Review and revise pleading re Insurer #36.	.50	162.50
Poz, N.	10/18/22	Communicate with team re meet-and-confer with insurers.	.10	32.50
Shore, R.	10/19/22	Analyze issues in preparation for strategy meeting with co-counsel.	.80	1,160.00
Shore, R.	10/19/22	Analysis re Deponent #13 inquiry.	.30	435.00

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Name	Date	Services	Hours	Amount
Girgenti, J.	10/19/22	Review and identify key provisions from at-issue policies.	6.80	2,482.00
Rubinstein, J.	10/19/22	Communicate with co-counsel re deposition preparation (0.5); communicate with R. Leveridge re same (0.2); participate in meet-and-confer discussion re insurer Rule 30(b)(6) depositions (1.2); analysis re Deponent #13 deposition (0.2).	2.10	1,785.00
Rush, M.	10/19/22	Review issues in preparation for meet-and-confer with insurers re Rule 30(b)(6) topics.	.50	350.00
Rush, M.	10/19/22	Meet-and-confer with insurers re Rule 30(b)(6) topics.	.60	420.00
Rush, M.	10/19/22	Confer with J. Rubinstein, A. Gaske, and J. Dougherty re meet-and-confer with insurers re Rule 30(b)(6) topics.	.60	420.00
Rush, M.	10/19/22	Continue reviewing documents in preparation for Insurer #25 depositions.	3.90	2,730.00
Gaske, A.	10/19/22	Meet-and-confer with insurers re responses to Rule 30(b)(6) notices (0.6); confer with team re next steps after meet-and-confer (0.6).	1.20	732.00
Gaske, A.	10/19/22	Correspond with team re upcoming depositions.	.50	305.00
Gaske, A.	10/19/22	Correspond with co-counsel re potential Rule 30(b)(1) witness.	.20	122.00
Gaske, A.	10/19/22	Revise memorandum summarizing meet-and-confer call.	1.90	1,159.00
Leveridge, R.	10/19/22	Communications with co-counsel re deposition scheduling and preparation.	1.30	1,885.00
Kaminsky, E.	10/19/22	Revise Insurer #36 pleading.	.20	112.00
Turner, C.	10/19/22	Review and organize Deponent #6 deposition materials.	.50	100.00
Turner, C.	10/19/22	Attend meet-and-confer with insurers re remaining offensive Rule 30(b)(6) deposition topics.	.60	120.00
Turner, C.	10/19/22	Continue to review and organize deposition materials for Deponent #7.	.80	160.00
Agwu, I.	10/19/22	Continue summarizing Deponent #12 deposition transcript.	6.50	3,087.50
Poz, N.	10/19/22	Participate in meet-and-confer call with opposing counsel re Rule 30(b)(6) deposition notices topics.	.60	195.00
Poz, N.	10/19/22	Draft summary of meet-and-confer with opposing counsel re Rule 30(b)(6) deposition notices topics.	1.10	357.50
Poz, N.	10/19/22	Confer with team re meet-and-confer call with opposing counsel on Rule 30(b)(6) deposition notices.	.60	195.00

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Name	Date	Services	Hours	Amount
Dougherty, J.	10/19/22	Participate in meet-and-confer with counsel for insurers re Rule 30(b)(6) deposition notices.	.60	432.00
Shore, R.	10/20/22	Confer with team re litigation status, strategy, and next steps.	.80	1,160.00
Girgenti, J.	10/20/22	Review and identify key provisions from at-issue policies.	6.30	2,299.50
Girgenti, J.	10/20/22	Confer with team re litigation update.	.80	292.00
Rubinstein, J.	10/20/22	Analysis re Deponent #13 deposition (0.4); revise litigation task list (0.5); revise Insurer #36 pleading (0.2); correspond with team re meet-and-confer letter (0.2); analysis re review of Deponent #6 documents in preparation for deposition (0.3); analysis re trial plan (1.1); communicate with R. Shore and R. Leveridge re same (0.5); confer with team re strategy (0.8); analysis re review of Insurer #25 documents (0.3); communicate with A. Gaske re production of FDA documents (0.1); communicate with co-counsel re strategy session (0.5); correspond with co-counsel re discovery correspondence from insurers (0.4).	5.30	4,505.00
Sanchez, J.	10/20/22	Confer with team re case status and strategy.	.80	380.00
Rush, M.	10/20/22	Review documents in preparation for insurer depositions.	1.50	1,050.00
Rush, M.	10/20/22	Communicate with L. Szymanski and J. Rubinstein re document review.	.30	210.00
Rush, M.	10/20/22	Confer with team re case status and strategy.	.80	560.00
Bonesteel, A.	10/20/22	Confer with team re case update and next steps.	.80	300.00
Gaske, A.	10/20/22	Confer with team re litigation strategy and next steps.	.80	488.00
Gaske, A.	10/20/22	Review FDA subpoena (0.2); correspond with co-counsel, opposing counsel, and team re FDA subpoena production (0.8).	1.00	610.00
Leveridge, R.	10/20/22	Confer with team re litigation status and strategy (0.8); communicate with R. Shore and J. Rubinstein re upcoming strategy meeting with co-counsel (0.5); review materials in preparation for co-counsel meeting (1.1).	2.40	3,480.00
Leveridge, R.	10/20/22	Communicate with co-counsel and opposing counsel re discovery matters.	.40	580.00
Kaminsky, E.	10/20/22	Confer with team re case update and strategy.	.80	448.00
Turner, C.	10/20/22	Finalize review and organization of deposition materials for Deponent #7.	1.80	360.00
Turner, C.	10/20/22	Review and organize FDA subpoena.	.80	160.00

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Name	Date	Services	Hours	Amount
Turner, C.	10/20/22	Confer with team re litigation strategy and case update.	.80	160.00
Hubbard, B.	10/20/22	Confer with team re status and strategy.	.80	340.00
Huddleston, D.	10/20/22	Confer with team re case status.	.80	380.00
Huddleston, D.	10/20/22	Continue drafting summary of Deponent #10 deposition.	7.00	3,325.00
Agwu, I.	10/20/22	Confer with team re case update.	.80	380.00
Poz, N.	10/20/22	Confer with team re case status and next steps.	.80	260.00
Dougherty, J.	10/20/22	Confer with team re case status and next steps.	.80	576.00
Shore, R.	10/21/22	Confer with Consulting Expert A re Issue #27.	1.00	1,450.00
Shore, R.	10/21/22	Analyze litigation and discovery issues in preparation for meeting with co-counsel re strategy.	.80	1,160.00
Shore, R.	10/21/22	Review correspondence re Issue #14.	.50	725.00
Shore, R.	10/21/22	Confer with R. Leveridge, J. Rubinstein, M. Rush, A. Gaske, and I. Agwu re Issue #14.	.50	725.00
Rubinstein, J.	10/21/22	Draft outline for meeting with co-plaintiffs' counsel re strategy (3.8); confer with team re Issue #14 (0.5); review correspondence with insurer counsel re FDA production (0.1); review production correspondence (0.1); analysis re Issue #13 (0.5); correspond with Debtors' counsel re discovery correspondence (0.5); review revised pleading re Insurer #36 (0.1); analysis of documents identified by M. Rush in preparation for upcoming depositions (0.3).	5.90	5,015.00
Rush, M.	10/21/22	Draft outline for insurer depositions.	2.00	1,400.00
Gaske, A.	10/21/22	Confer with team re strategy for Issue #14.	.50	305.00
Leveridge, R.	10/21/22	Confer with team re Issue #14 strategy.	.50	725.00
Leveridge, R.	10/21/22	Review relevant materials and issues in preparation for upcoming co-counsel meeting.	2.10	3,045.00
Turner, C.	10/21/22	Review and organize deposition materials for Deponent #6.	.30	60.00
Huddleston, D.	10/21/22	Revise summary deposition chart.	2.30	1,092.50
Agwu, I.	10/21/22	Confer with R. Shore, R. Leveridge, J. Rubinstein, M. Rush and A. Gaske re Issue #14.	.50	237.50
Agwu, I.	10/21/22	Continue summarizing Deponent #12 deposition transcript.	6.50	3,087.50
Poz, N.	10/21/22	Revise pleading re Insurer #36.	.40	130.00
Rubinstein, J.	10/23/22	Review litigation issues in preparation for meeting with co-plaintiffs' counsel re strategy.	1.00	850.00
Shore, R.	10/24/22	Analysis of litigation and discovery issues in preparation for meeting with co-counsel re strategy.	3.30	4,785.00

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Rubinstein, J.	10/24/22	Analysis re experts (0.5); review litigation and discovery strategy in preparation for meeting with co-plaintiff (3.4).	3.90	3,315.00
Rush, M.	10/24/22	Review insurer documents in preparation for depositions.	5.40	3,780.00
Rush, M.	10/24/22	Draft outlines for insurer depositions.	1.50	1,050.00
Gaske, A.	10/24/22	Confer with co-plaintiffs re Rule 30(b)(1) deponent.	.10	61.00
Gaske, A.	10/24/22	Revise letter to insurers re Rule 30(b)(6) deposition topics.	4.90	2,989.00
Gaske, A.	10/24/22	Research re letter to insurers re Rule 30(b)(6) deposition topics.	1.50	915.00
Leveridge, R.	10/24/22	Analyze litigation and discovery status in preparation for strategy meeting with co-counsel.	4.80	6,960.00
Sraders, S.	10/24/22	Review status of depositions and discovery.	.50	330.00
Sraders, S.	10/24/22	Analyze underlying litigation materials.	2.10	1,386.00
Agwu, I.	10/24/22	Continue summarizing Deponent #12 deposition transcript.	4.00	1,900.00
Poz, N.	10/24/22	Review topics for offensive and defensive notices of depositions.	1.50	487.50
Dougherty, J.	10/24/22	Revise draft letter to insurers re parties' positions with respect to Rule 30(b)(6) notices to insurers.	.80	576.00
Shore, R.	10/25/22	Confer with Debtors' counsel and UCC counsel re litigation strategy.	6.60	9,570.00
Rubinstein, J.	10/25/22	Participate in meeting with co-counsel re strategy.	6.60	5,610.00
Rush, M.	10/25/22	Continue drafting outlines for Insurer #25 depositions.	3.00	2,100.00
Gaske, A.	10/25/22	Correspond with R. Shore re prior research on Issue #27.	.30	183.00
Leveridge, R.	10/25/22	Participate in meeting with co-counsel re strategy.	6.60	9,570.00
Sraders, S.	10/25/22	Review draft letter to insurers re Rule 30(b)(6) objections.	.20	132.00
Sraders, S.	10/25/22	Confer with Reed Smith, Akin Gump, R. Shore, R. Leveridge and J. Rubinstein re case strategy (partial).	.80	528.00
Agwu, I.	10/25/22	Finish summarizing deposition transcript of Deponent #12.	2.00	950.00
Dougherty, J.	10/25/22	Revise draft letter to insurers re Rule 30(b)(6) notices.	1.10	792.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	10/26/22	Analysis re various litigation issues (1.0); revise draft discovery correspondence (0.2); review medical article re opioids (0.2); review case law re Issue #32 (0.3); begin review of collection of identified documents in preparation for Deponent #7 deposition (2.4).	4.10	3,485.00
Rush, M.	10/26/22	Draft outlines for insurer depositions.	3.10	2,170.00
Gaske, A.	10/26/22	Correspond with J. Rubinstein re status of various projects.	.30	183.00
Gaske, A.	10/26/22	Draft correspondence to Insurer #24 re Rule 30(b)(1) deposition.	.30	183.00
Gaske, A.	10/26/22	Review J. Dougherty revisions to letter to insurers re Rule 30(b)(6) topics.	.30	183.00
Leveridge, R.	10/26/22	Communicate with E. Kaminsky re responding to portion of insurer discovery letter.	.40	580.00
Leveridge, R.	10/26/22	Communicate with co-counsel re strategy.	.40	580.00
Sraders, S.	10/26/22	Review summary of Deponent #10 deposition.	.20	132.00
Kaminsky, E.	10/26/22	Analyze deficiency letter and prior correspondence re AHC privilege log in response to Insurers.	.40	224.00
Kaminsky, E.	10/26/22	Draft response to deficiency letter re AHC production.	.50	280.00
Turner, C.	10/26/22	Draft notice of deposition for Rule 30(b)(1) for Deponent #16.	.30	60.00
Turner, C.	10/26/22	Review and organize Rule 30(b)(1) Deponent #16 deposition materials.	.70	140.00
Agwu, I.	10/26/22	Research re Issue #14.	3.00	1,425.00
Agwu, I.	10/26/22	Review master list of opioid cases re Issue #14.	2.00	950.00
Poz, N.	10/26/22	Review and organize materials in preparation for Insurer #25 depositions.	3.10	1,007.50
Shore, R.	10/27/22	Confer with team re status, strategy, and next steps.	1.20	1,740.00
Shore, R.	10/27/22	Confer with J. Rubinstein and A. Gaske re Insurer #15 and related issues (1.0); analyze litigation issues discussed with co-plaintiffs (1.8).	2.80	4,060.00



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Name	Date	Services	Hours	Amount
Rubinstein, J.	10/27/22	Review draft stipulation in lieu of testimony on Debtors' Rule 30(b)(6) topic #8 (0.2); correspond with co-counsel re same (0.1); confer with R. Shore and A. Gaske re Debtors' coverage portfolio (1.0); review policy stipulations (0.2); analysis re open legal research issues (1.4); communicate with M. Rush re upcoming Insurer #25 depositions (0.3); update litigation task list (0.5); confer with team re strategy and next steps (1.2); communicate with co-counsel re potential expert information (0.5); analysis of policy language (0.2); correspond with S. Sraders re legal research question (0.1).	5.70	4,845.00
Sanchez, J.	10/27/22	Confer with team re case update.	1.20	570.00
Rush, M.	10/27/22	Confer with team re case status and strategy.	1.20	840.00
Rush, M.	10/27/22	Review documents in preparation for Insurer #25 deposition.	1.30	910.00
Martinez, S.	10/27/22	Confer with team re case status and strategy.	1.20	390.00
Gaske, A.	10/27/22	Confer with team re litigation strategy and next steps.	1.20	732.00
Gaske, A.	10/27/22	Review policy terms of certain policies.	.50	305.00
Gaske, A.	10/27/22	Confer with R. Shore and J. Rubinstein re policy terms of certain policies.	1.00	610.00
Gaske, A.	10/27/22	Review revisions to policy stipulation for Insurers #9 and #23.	.30	183.00
Gaske, A.	10/27/22	Review policy limits.	.30	183.00
Gaske, A.	10/27/22	Correspond with opposing counsel re Rule 30(b)(1) deposition.	.10	61.00
Leveridge, R.	10/27/22	Communicate with team re Deponent #7 deposition preparation (0.6); confer with team re case status (1.2).	1.80	2,610.00
Sraders, S.	10/27/22	Confer with team re litigation status and next steps.	1.20	792.00
Sraders, S.	10/27/22	Communicate with J. Rubinstein re upcoming deposition of Deponent #3.	.10	66.00
Sraders, S.	10/27/22	Research re Issue #56.	.60	396.00
Kaminsky, E.	10/27/22	Confer with team re litigation status.	1.20	672.00
Kaminsky, E.	10/27/22	Draft response to deficiency letter re AHC production.	.80	448.00
Turner, C.	10/27/22	Review materials for Insurer #25 depositions.	1.10	220.00
Turner, C.	10/27/22	Confer with team re strategy and case updates.	1.20	240.00
Hubbard, B.	10/27/22	Confer with team re status and strategy.	1.20	510.00
Huddleston, D.	10/27/22	Confer with team re case update and next steps.	1.20	570.00
Agwu, I.	10/27/22	Confer with team re case update and strategy.	1.20	570.00

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Name	Date	Services	Hours	Amount
Agwu, I.	10/27/22	Research Issue #19.	2.90	1,377.50
Poz, N.	10/27/22	Confer with team re case status and next steps.	1.20	390.00
Dougherty, J.	10/27/22	Confer with team re status and next steps.	1.20	864.00
Shore, R.	10/28/22	Confer with team re Insurer #25 depositions.	.50	725.00
Rubinstein, J.	10/28/22	Confer with R. Shore, R. Leveridge and M. Rush in preparation for Rule 30(b)(1) deposition of Insurer #25 (0.5); review collection of identified documents in preparation for defense of Deponent #7 deposition (3.6); review proposed response to insurers re privilege logs (0.2).	4.30	3,655.00
Rush, M.	10/28/22	Confer with R. Shore, R. Leveridge and J. Rubinstein re Insurer #25 depositions.	.50	350.00
Rush, M.	10/28/22	Draft outlines for Insurer #25 depositions.	8.20	5,740.00
Gaske, A.	10/28/22	Review current research re Issue #25.	.60	366.00
Gaske, A.	10/28/22	Draft beginning of memorandum re Issue #25.	1.50	915.00
Leveridge, R.	10/28/22	Confer with team re upcoming Insurer #25 depositions (0.5); review materials re same (0.7).	1.20	1,740.00
Leveridge, R.	10/28/22	Review materials in preparation for deposition of Deponent #7.	1.60	2,320.00
Kaminsky, E.	10/28/22	Draft response to deficiency letter re AHC production.	.60	336.00
Kaminsky, E.	10/28/22	Research re Issue #51.	2.30	1,288.00
Agwu, I.	10/28/22	Research cases in preparation for Insurer #25 depositions.	2.00	950.00
Agwu, I.	10/28/22	Continue research re Issue #19.	2.00	950.00
Agwu, I.	10/28/22	Review documents in preparation for Deponent #6 deposition.	2.00	950.00
Rubinstein, J.	10/29/22	Analysis re forthcoming Insurer #25 Rule 30(b)(1) depositions.	.50	425.00
Rush, M.	10/29/22	Draft outlines for Insurer #25 depositions.	2.00	1,400.00
Rubinstein, J.	10/30/22	Review selected documents in preparation for meeting with Deponent #7 in preparation for deposition.	1.30	1,105.00
Leveridge, R.	10/30/22	Review materials for deposition of Deponent #7.	1.40	2,030.00
Shore, R.	10/31/22	Confer with J. Rubinstein and R. Leveridge re trial planning and related tasks.	.70	1,015.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	10/31/22	Communicate with team re review of received document productions (0.2); confer with R. Shore and R. Leveridge re strategy and next step (0.7); analysis re Insurer #36 coverage (0.3); correspond with team re discovery letter responses (0.3); communicate with M. Rush re preparation for depositions of Insurer #25 witnesses (0.5); correspond with B. Hubbard re data analysis (0.3); review documents identified in preparation for deposition of Deponent #7 (3.7); identify materials for review by Consulting Expert A (0.6).	6.60	5,610.00
Sanchez, J.	10/31/22	Confer with team re research assignments.	.80	380.00
Sanchez, J.	10/31/22	Confer with A. Gaske re Issue #45 research.	.40	190.00
Rush, M.	10/31/22	Draft outline for depositions re Insurer #25.	9.80	6,860.00
Martinez, S.	10/31/22	Review and organize materials re Deponent #7 deposition.	.10	32.50
Bonesteel, A.	10/31/22	Review Deponent #7 deposition preparation materials.	.40	150.00
Gaske, A.	10/31/22	Confer with J. Dougherty, S. Sraders, J. Sanchez, I. Agwu, and D. Huddleston re research Issues #25, #33, and #45.	.80	488.00
Gaske, A.	10/31/22	Confer with J. Sanchez re researching Issue #45.	.40	244.00
Gaske, A.	10/31/22	Communicate with team re recent productions.	.40	244.00
Gaske, A.	10/31/22	Communicate with Insurer #33 re deponents.	.20	122.00
Gaske, A.	10/31/22	Analysis re Issue #52.	4.00	2,440.00
Leveridge, R.	10/31/22	Confer with R. Shore and J. Rubinstein re trial planning and related tasks.	.70	1,015.00
Leveridge, R.	10/31/22	Review materials in preparation for deposition of Deponent #7.	2.00	2,900.00
Sraders, S.	10/31/22	Confer with J. Dougherty, A. Gaske, J. Sanchez, D. Huddleston, and I. Agwu re various research topics and memoranda.	.80	528.00
Sraders, S.	10/31/22	Communicate with J. Rubinstein re Deponent #3.	.10	66.00
Turner, C.	10/31/22	Review and organize third-party subpoena productions.	2.60	520.00
Hubbard, B.	10/31/22	Identify materials to provide to Consulting Expert A.	.70	297.50
Huddleston, D.	10/31/22	Confer with team re research assignments.	.80	380.00
Agwu, I.	10/31/22	Confer with J. Dougherty, A. Gaske, S. Sraders, D. Huddleston and J. Sanchez re research assignments.	.80	380.00
Agwu, I.	10/31/22	Research Issue #14.	3.10	1,472.50
Agwu, I.	10/31/22	Research Issue #38.	4.00	1,900.00

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Name	Date	Services	Hours	Amount
Poz, N.	10/31/22	Review materials in preparation for deposition of Deponent #7.	.80	260.00
Poz, N.	10/31/22	Review and update materials for depositions of Deponents #1 and #2.	.60	195.00
Poz, N.	10/31/22	Review document productions of Insurers #15 and #27.	.90	292.50
Dougherty, J.	10/31/22	Confer with A. Gaske, S. Sraders, J. Sanchez, I. Agwu, and D. Huddleston re research topics.	.80	576.00
Project Total:			606.90	\$ 399,028.50
<b>TOTAL CHARGEABLE HOURS</b>			<b>638.50</b>	
<b>TOTAL FEES</b>				<b>\$ 417,898.50</b>

#### TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	1.00	1,800.00	1,800.00
Shore, R.	8.00	725.00	5,800.00
Shore, R.	33.00	1,450.00	47,850.00
Girgenti, J.	47.40	365.00	17,301.00
Rubinstein, J.	8.00	425.00	3,400.00
Rubinstein, J.	78.90	850.00	67,065.00
Sanchez, J.	10.30	475.00	4,892.50
Rush, M.	87.20	700.00	61,040.00
Martinez, S.	3.70	325.00	1,202.50
Bonesteel, A.	3.80	375.00	1,425.00
Gaske, A.	76.80	610.00	46,848.00
Leveridge, R.	8.00	725.00	5,800.00
Leveridge, R.	33.30	1,450.00	48,285.00
Sraders, S.	6.60	660.00	4,356.00
Kaminsky, E.	15.10	560.00	8,456.00
Turner, C.	39.70	200.00	7,940.00
Hubbard, B.	19.40	425.00	8,245.00
Huddleston, D.	25.40	475.00	12,065.00
Agwu, I.	86.90	475.00	41,277.50
Poz, N.	26.00	325.00	8,450.00
Dougherty, J.	20.00	720.00	14,400.00
<b>TOTALS</b>	<b>638.50</b>		<b>\$ 417,898.50</b>

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## TASK SUMMARY

Task	Description	Hours	Amount
A004	Case Administration	6.00	1,200.00
A009	Meetings / Communications with AHC & Creditors	1.60	2,670.00
A015	Non-Working Travel (Billed @ 50%)	24.00	15,000.00
A020	Insurance Adversary Proceeding	606.90	399,028.50

## EXPENSE DETAILS

### E110: Out-of-Town Travel

Date	Description	Task	Amount
10/25/22	Travel - Train Fare / Jason Rubinstein / (Roundtrip / Business Class) from Washington, DC to New York, NY / Attend strategic planning meeting with co-counsel / 10/24-25/22	E110	640.00
10/25/22	Travel - Train Fare (NYC subway) / Jason Rubinstein / New York, NY / Attend strategic planning meeting with co-counsel / 10/24-25/22	E110	3.00
10/25/22	Travel - Parking / Jason Rubinstein / New York, NY / Attend strategic planning meeting with co-counsel / 10/24-25/22	E110	50.00
10/25/22	Travel - Lodging / Jason Rubinstein / New York, NY / Attend strategic planning meeting with co-counsel / 10/24-25/22	E110	500.00
10/25/22	Travel - Meals / Jason Rubinstein / New York, NY / Attend strategic planning meeting with co-counsel / 10/24-25/22	E110	42.49
10/26/22	Travel - Train Fare / Richard Leveridge / (Roundtrip / Business Class) from Washington, DC to New York City, NY / Attend client meetings / 10/24-26/2022	E110	606.00
10/26/22	Travel - Train Fare (NYC subway) / Richard Leveridge / New York City, NY / Attend client meetings / 10/24-26/2022	E110	10.00
10/26/22	Travel - Parking / Richard Leveridge / Washington, DC Union Station / Attend client meetings in New York, NY / 10/24-26/2022	E110	75.00
10/26/22	Travel - Lodging / Richard Leveridge / New York City, NY / Attend client meetings / 10/24-26/2022 (2 nights)	E110	1,000.00
10/26/22	Travel - Meals / Richard Leveridge / New York City, NY / Attend client meetings / 10/24-26/2022 (2 meals)	E110	48.56
<b>Sub-Total of Expenses:</b>			<b>\$ 2,975.05</b>

### E115: Deposition Transcripts

Date	Description	Task	Amount
9/09/22	Depositions/Transcripts - Veritext - Video services for Deponent #8 deposition	E115	1,065.00
9/09/22	Depositions/Transcripts - Veritext - Transcript of Deponent #8 deposition	E115	956.15
9/20/22	Depositions/Transcripts - Veritext - Transcript of Deponent #12	E115	2,166.00
<b>Sub-Total of Expenses:</b>			<b>\$ 4,187.15</b>

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**E118: Litigation Support Vendors**

<b>Date</b>	<b>Description</b>	<b>Task</b>	<b>Amount</b>
9/30/22	Contracted Professional Fees - Aldebaran Group - Case Support - 09/01/2022 to 09/30/2022	E118	159.53
9/30/22	Contracted Professional Fees - Cobra Legal Solutions LLC - Tech Time / License-Hosting Fees / 9.2022	E118	1,142.82
	<b>Sub-Total of Expenses:</b>		<b>\$ 1,302.35</b>
	<b>TOTAL EXPENSES</b>		<b>\$ 8,464.55</b>
	<b>TOTAL FEES AND EXPENSES</b>		<b>\$ 426,363.05</b>